

1 Nathan R. Ring
Nevada State Bar No. 12078
2 **STRANCH, JENNINGS & GARVEY, PLLC**
3100 W. Charleston Boulevard, Suite 208
3 Las Vegas, NV 89102
Telephone: (725) 235-9750
4 lasvegas@stranchlaw.com

5 Linda P. Nussbaum (pro hac vice forthcoming)
NUSSBAUM LAW GROUP, PC
6 1133 Avenue of the Americas, 31st Floor
New York, New York, 10036
7 T: (917) 438-9189
lnussbaum@nussbaumpc.com

8 James E. Cecchi (pro hac vice forthcoming)
9 Caroline F. Bartlett (pro hac vice forthcoming)
CARELLA BYRNE CECCHI
10 **BRODY & AGNELLO, PC**
5 Becker Farm Road
11 Roseland, New Jersey 07068
T: (973) 994-1700
12 jcecchi@carellabyrne.com
cbartlett@carellabyrne.com

13 *Counsel for Plaintiff and the Proposed Class*

14 Todd L. Bice
Nevada State Bar No. 4534
15 **PISANELLI BICE PLLC**
16 400 S. 7th Street Suite 300
Las Vegas, NV 89101
17 Telephone: 702.214.2100
tlb@pisanellibice.com

18 Angela C. Agrusa*
19 **DLA PIPER LLP (US)**
2000 Avenue of the Stars
20 Suite 400 North Tower
Los Angeles, CA 90067-4735
21 Telephone: 310.595.3000
angela.agrusa@us.dlapiper.com

22 **Pro hac vice application forthcoming*

23 *Attorneys for Defendant*
24 *MGM Resorts International*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

MICHAEL MANSON, individually and on
behalf of all others similarly situated,
Plaintiff,

v.

MGM RESORTS INTERNATIONAL,
Defendant.

Case No. 2:23-cv-1826-CDS-EJY

**STIPULATION TO EXTEND TIME
TO FILE DEFENDANT'S
RESPONSE TO COMPLAINT
(FIRST REQUEST)**

Pursuant to LR IA 6-1, Plaintiff Michael Manson and Defendant MGM Resorts International ("MGM") (collectively, the "Parties") respectfully stipulate MGM's time to respond to the Complaint be extended from the current deadline of January 8, 2024 to and including March 11, 2024. This is the first stipulation for an extension of time to file MGM's responsive pleading.

Good cause exists to enlarge the time for MGM to respond to the Complaint. There are currently twelve other related actions filed against MGM pending in the District of Nevada (the "Related Actions"). *See Kirwan v. MGM Resorts Int'l*, No. 2:23-cv-01481; *Zussman v. VICI Properties I LLC, et al.*, No. 2:23-cv-01537; *Lackey v. MGM Resorts Int'l*, No. 2:23-cv-01549; *Pircio v. MGM Resorts Int'l*, No. 2:23-cv-01550; *Terezo v. MGM Resorts Int'l*, No. 2:23-cv-01577; *Rundell v. MGM Resorts Int'l*, No. 2:23-cv-01698; *Bezak v. MGM Resorts Int'l*, No. 2:23-cv-01719; *Owens v. MGM Resorts Int'l*, No. 2:23-cv-1480; *Zari v. MGM Resorts Int'l*, No. 2:23-cv-01777; *Albrigo v. MGM Resorts Int'l*, No. 2:23-cv-01981; *Sloan v. Vici Properties Inc., et al.*, No. 2:23-cv-02042; *Righetti v. MGM Resorts Int'l*.

On December 6 and December 20, 2023, plaintiffs' counsel in six consolidated putative class actions brought against MGM by individuals who allege their PII was compromised as a result of a cybersecurity incident involving MGM in 2019 (the "2019 Actions") filed Notices of Related Cases Pursuant to District of Nevada Local Rule 42.1, notifying the Court that the Related Actions are related to the 2019 Actions. In re: MGM

1 Resorts Int'l Data Breach Litig., No. 2:20-CV-00376-GMN-NJK, ECF 186, 188. Plaintiffs
2 in this action have opposed this effort because the 2019 Actions involved a different threat
3 actor and different data.

4 The parties in the Related Actions are discussing this development in addition to the
5 consolidation of the Related Actions. As such, additional time is required to permit time to
6 meet and confer with the various parties to the Related Actions.

7 The Parties' request is made in good faith to enable the parties to finalize the joint
8 motion for consolidation and conserve judicial and party resources. Moreover, this case is
9 in its infancy, and this request will not prejudice any party.

10 **WHEREAS** the Parties respectfully request that MGM shall have until March 11,
11 2024, to answer, move, or otherwise respond to the Complaint.

12 Dated: January 5, 2024

Respectfully submitted,

13 /s/ Nathan R. Ring

14 Nathan R. Ring
15 Nevada State Bar No. 12078
16 **STRANCH, JENNINGS & GARVEY, PLLC**
17 3100 W. Charleston Boulevard, Suite 208
18 Las Vegas, NV 89102
Telephone: (725) 235-9750
lasvegas@stranchlaw.com

19 Linda P. Nussbaum (pro hac vice
20 forthcoming)
21 **NUSSBAUM LAW GROUP, PC**
1133 Avenue of the Americas, 31st Floor
New York, New York, 10036
T: (917) 438-9189
lnussbaum@nussbaumpc.com

23 James E. Cecchi (pro hac vice
24 forthcoming)
25 Caroline F. Bartlett (pro hac vice
26 forthcoming)
27 **CARELLA BYRNE CECCHI**
BRODY & AGNELLO, PC
5 Becker Farm Road
Roseland, New Jersey 07068
T: (973) 994-1700
jcecchi@carellabyrne.com
cbartlett@carellabyrne.com

Counsel for Plaintiff and the Proposed Class

/s/ Todd L. Bice

Todd L. Bice, ##4534
PISANELLI BICE, PLLC
400 S. 7th Street Suite 300
Las Vegas, NV 89101
Telephone: 702.214.2100
tlb@pisanellibice.com

Angela C. Agrusa
DLA PIPER LLP (US)
2000 Avenue of the Stars
Suite 400 North Tower
Los Angeles, CA 90067-4735
Telephone: 310.595.3000
Angela.agrusa@us.dlapiper.com

*Attorneys for Defendant
MGM Resorts International*

IT IS SO ORDERED:



THE HONORABLE CRISTINA D. SILVA
UNITED STATES DISTRICT JUDGE

DATED: January 5, 2024 _____